

*Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision:*

A mechanic called a sales representative to identify a failure in a brake rotor. This was the first report of its kind. There were no other similar reports in the company's possession. The Firm received a second incident report on or about 10/3/2023. The company instituted an investigation and identified the edge code on the rotor indicating one of the company's suppliers. On or about that date, in an abundance of caution, the company immediately notified its distributors to stop distribution of the product while it investigated. The company continued to investigate the issues with its supplier and to study the failure mode. The company had to wait for its supplier to provide it with affected date and batch codes and SKUs as there were a large number of affected parts. See attached list. There was back-and-forth communication between the supplier and the company as part of the investigation from early October through early November. On or about 10/16/2023, the company began testing in-stock inventory. The foreign supplier visited the company's U.S. facility to conduct field testing. Through this and subsequent testing, the company was ultimately able to identify the precise conditions where the manufacturing of the brake rotor did not conform to the company's specifications. During the time period between mid October and early November, the company worked internally and with its supplier to identify the lots of brake rotors that were affected. The company then took that information in an attempt to determine how and when the products were sold, in a complicated supply chain involving sales direct to consumers via e-commerce and also through a large number of distributors, auto parts stores, and ultimately to mechanics. On or about 12/16/2023, the company was able to ascertain the locations and distribution of products in its distribution chain and determine how it was going to fully reimburse consumers, including labor costs, as part of a corrective action. The company also drafted its consumer, retailer, and distributor notifications leading up to the Christmas holiday and worked with its distributors and Amazon.com to make sure that all of the notices would be promptly distributed upon NHTSA review. The company then promptly filed its section 573 report with NHTSA on 1/4/2024 to institute a voluntary recall and immediately distributed its notices to consumers and to its distributors and retailers.

No accidents or injuries have been reported.